

overhead loading currently permitted with respect to our VEIC services. Here again, U S WEST would be more than willing to adjust our VEIC rates up by incorporating a 1.949 factor.

The real complaint of our opponents seems to be that U S WEST disagrees with the fundamental philosophical position of the Commission, the Bureau and the interconnectors,²³ rather than that we failed to provide adequate information. Contrary to ELI's assertion, we did not use our philosophical opposition "to avoid [our] obligations under the [Investigation] Order."²⁴ On the contrary, we were in substantial compliance with the requirements of that Order. Our Direct Case cannot be characterized as contemptuous, "disingenuous,"²⁵ or dilatory.

²³ ALTS asserts, for example, that comparability is determined by reference to "the viewpoint of the customer." ALTS at 17. There might be some confusion here. In determining whether a service is a "like" service for purposes of 47 USC § 202(a), the perspective of the customer is critical. For purposes of determining whether two services, with different "customers" of each service, are "comparable," one must go elsewhere, or at least beyond, the sole opinion of one of the customers. Interconnectors purchasing VEIC services are not, in such context, automatically customers of DS1/DS3 services; customers of DS1/DS3 services are not customers of VEIC services. In such a situation, "comparability" is not determined by the opinion of one customer with respect to a product that they do not purchase. While such opinion might be articulated and might be persuasive with regard to a policy decision-maker, its persuasiveness does not stem from it being an accurate statement of the law. Thus, U S WEST stands by its "techno-blather" (*id.*) with respect to our position.

²⁴ ELI at 4.

²⁵ ALTS at 5.

III. OTHER MISCELLANEOUS OBJECTIONS

A. Volume and Term Discounts

Our VEIC service is a month-to-month service. As a result, there are no term or volume "discounts" associated with the service. And, the overhead loading factors are based on the month-to-month nature of the term. At this time, U S WEST is unwilling to change this tariff structure. Accordingly, the application of overhead factors applicable to a "term" agreement would be inappropriate.

Furthermore, and again referencing the materials we filed in September of 1994,²⁶ a perusal of the overhead factors applied to our DS1 and DS3 channel terminations, with or without SHARP, with terms ranging from monthly to 120-months, demonstrates a range of overhead loading factors from 1.4003 to 2.9105.²⁷ Thus, it is impossible for U S WEST to see how an interconnector could be harmed by continuing with our month-to-month VEIC service, currently utilizing an overhead factor of 1.3, as prescribed by the Commission. Indeed, U S WEST continues to believe that overhead loading factors of 1.71 to 1.73, which we advocated in our original

²⁶ See Attachment B at 2-8.

²⁷ This information is far more timely than that cited by MFS in its filing. See MFS at 17 n.46 (and its reference to a 1991 U S WEST filing (U S WEST Tariff F.C.C. No. 1, Transmittal No. 222, issued Dec. 31, 1991), which addressed a service offering involving "36 DS3 circuits for term commitments of up to 10 years.").

tariff filing,²⁸ are the most appropriate overhead loading factors to be used with respect to our VEIC services.

B. Promotional Offerings

MFS argues that promotional offerings are “services” “comparable” to VEIC services.²⁹ The fundamental problem with this argument is that promotional “offerings” are not services at all. Promotional offerings represent marketing decisions with respect to the creation or stimulation of increased demand. They are generally short-term, generally applied to retail market offerings, and form no basis of the long-term costing/pricing structure of the underlying service.

Having said all that, it is clear that U S WEST is not absolutely opposed to allowing a promotional offering to apply to VEIC services,³⁰ in those circumstances where a business decision has been made that the extension of the promotion makes sense.³¹ We would, however, object to the approach suggested by MFS: that the Bureau establish some broad-based, generic rule that all LEC promotions should extend to VEIC services, including (apparently) all elements of the VEIC service.³² Such a broad ruling is totally unnecessary.

²⁸ See supra note 19.

²⁹ See MFS at 19-22.

³⁰ See U S WEST Direct Case at 2-3; MFS at 19-20 (commenting on U S WEST's position).

³¹ A factor in this decision would be whether the failure to extend the promotion would be perceived as unfair or anti-competitive -- a different factor than usually goes into a decision to offer promotions at the retail level.

³² MFS at 21.

When LECs introduce promotions in tariffs, there is the opportunity to review the scope and the extent of the promotion. If purchasers of VEIC services are included, there has been no "harm," either real or perceived. If they are not included, undoubtedly the LEC Description and Justification will explain why they were excluded. If there is no discussion of the matter, or if the explanation is unsatisfactory to an interconnector, an interested interconnector can Petition to Reject the proposed tariff. Given the fact that promotional offerings are tied to specific common carrier offerings, and that their scope and extent is so easily addressed via the tariff process, there is no good reason to establish, in advance and in the absence of specific fact showings, a prescriptive rule in this area.

C. Annual Cost Factors

1. Annual Cost Factors Change Annually

MFS contends that U S WEST used significantly lower annual cost factors for the DS3 costs as compared to the EICT.³³ U S WEST agrees that the factors are different.³⁴ They are different because: (1) the cost studies were completed in different years (1993 and 1995); and (2) the cost study years were different (1993 and 1995). The DS3 cost study which MFS references was completed in 1993, utilizing 1993 costs. The EICT cost study was completed in 1995 and used 1995 costs, reflecting

³³ See MFS at 17-18.

³⁴ See U S WEST Direct Case at 5-6.

the latest 1995 cost factor release for U S WEST. Cost factors are usually revised each year and are based on the most current information available.

2. Refund of Overheads

MFS is in error, at least for U S WEST, when it states the "LECs incorporate overheads into nonrecurring charges by application of an annual cost factor."³⁵ It is true that U S WEST used expense factors to develop the direct costs for its EIC nonrecurring charges. However, the expense factors applied by U S WEST were not annualized but represented one-time expenses. The operating expenses associated with the line and staff operations are for the initial installation of the EIC rate elements. Since U S WEST did "not apply annual cost factors" to our one-time charges but, rather, "incur[red] all nonrecurring costs 'up front'," in MFS's own words, "no refund mechanism is necessary."³⁶

D. Recovery of Overheads in Nonrecurring Charges

Since U S WEST's VEIC service is a month-to-month service, all the nonrecurring costs are recovered through nonrecurring charges.³⁷ While it is correct that, in certain circumstances, we recover certain nonrecurring charges through recurring rates with respect to our high capacity services offered pursuant to term

³⁵ MFS at 23.

³⁶ *Id.*

³⁷ See U S WEST Direct Case at 12-13.

agreements, the lack of a term option with respect to VEIC services renders such a cost recovery model inappropriate.

Furthermore, since U S WEST will shortly be filing a tariff to implement what has become known in the trade as the "\$1.00 deal," there is no need to "spread" the costs of the VEIC equipment out over time. The LEC should be able to recover the costs of installation, engineering and training immediately (especially in a month-to-month environment). If the Bureau were to allow the recovery of these logically noncurring costs to be recovered via a recurring charge, the interconnector could lawfully discontinue service two months after installation leaving the LEC with unrecovered costs. Additionally, the LEC would be required to turn back the VEIC equipment to the interconnector. The LEC, then, would have no asset in its central office to which its newly-developed "expertise" would pertain and no ability to put the VEIC equipment to the general use of the public telephone network.

IV. CONCLUSION

For the above-stated reasons, the Bureau should reject the oppositions filed against U S WEST's Direct Case. We have provided the information requested by

the Bureau and answered the questions asked. Having fully performed that which was asked of us, the objections of opponents to our Direct Case should be dismissed.

Respectfully submitted,

U S WEST COMMUNICATIONS, INC.

By:

Kathryn Marie Krause / KS
Kathryn Marie Krause
Suite 700
1020 19th Street
Washington, DC 20036
(303) 672-2859

Its Attorney

Of Counsel,
Laurie J. Bennett

April 11, 1995

ATTACHMENT A

At paragraph 17(e) of the Investigation Order, the Bureau requested that U S WEST identify the investment components of the services deemed comparable in the TRP Order, if U S WEST does not agree with the Bureau's conclusions regarding comparability. The services listed in the TRP Order were: (1) DS1 and DS3 point to point special access services, DS1 and DS3 switched transport services (if the rates for these switched services differ from the special access services) (which, in U S WEST's case, they do not); (2) volume and term services; (3) interoffice services comprised of channel terminations and mileage; and (4) specialized service offerings, e.g., self-healing network services. Once the investment components were identified, they were to be compared to the EIC DS1 and DS3 services. Differences were to be explained.

As demonstrated in the comparison of investment components below, the components of the U S WEST DS1/DS3 EICT and special access DS1/DS3 services are entirely different. The reason for the difference is that the DS1/DS3 EICTs only connect the interconnector designated equipment ("IDE") in the U S WEST central office with another U S WEST access service within the same central office. They do not extend out to the customer's premises. Quite the contrary, DS1 and DS3 services connect U S WEST equipment in the central office with a customer's premises. Hence, the need for additional investment components.

From an investment component standpoint, the volume and term discount rate elements are not "services" different from the special access services (e.g., DS1 and DS3). Volume and term discounts are pricing plan features, based on a customer's commitment to purchase a certain capacity or volume of services and/or to continue to purchase (and be financially liable for) service for an extended period of time.

SHARP services are options to the DS1 and DS3 services. As such, from an investment category standpoint, SHARP services add additional investment to the DS1 and DS3 services, as shown below.

The switched access Entrance Facility ("EF") utilizes the same investment categories as the DS1 and DS3 services themselves. The DS1 and DS3 EFs are priced the same as the DS1 and DS3 special access services.

Transport (mileage) does not produce any independent investment components. Rather, it merely requires added investment to the underlying DS1 and DS3 service components, as the number of miles covered on a physical plane are increased and the number of wire centers the service passes through are increased.

Service

Investment Components

DS1 and DS3 EICT

coax cable and digital cross connect panel

**DS1/DS3 Service
and DS1/DS3 Entrance
Facility (switched access)**

fiber termination panels, fiber optic terminals, digital cross connect panels/systems, fiber, repeaters, performance monitoring/testing equipment

Transport (mileage)

includes the same investment components as DS1 and DS3, with the exception of monitoring/testing equipment

SHARP

additional fiber and distribution panel is added to the DS1/DS3 Service for this option

U S WEST DIRECT CASE REBUTTAL

ATTACHMENT B

TRANSMITTAL NO. 530 OVERHEAD FACTORS

U S WEST COMMUNICATIONS INC.
1801 California Street Room 4750
Denver, Colorado 80202
303 896-8674

C. Scott McClellan
Vice President - Public Policy
and External Affairs

September 1, 1994

ORIGINAL COPY
Initials
To
USWEST
COMMUNICATIONS ©

Transmittal No. 530

Secretary
Federal Communications Commission
1919 "M" Street, NW, Room 222 SC1170
Washington, D.C. 20554

Attention: Common Carrier Bureau

The accompanying tariff material, issued on behalf of U S WEST Communications Inc. d/b/a U S WEST Communications (USWC) and bearing Tariff F.C.C. No. 5, effective as reflected on the attached tariff pages, is sent to you for filing in compliance with the requirements of the Communications Act of 1934, as amended. This material consists of tariff pages indicated on the following check sheet(s):

Tariff F.C.C. No.
5

Check Sheet Revision No.
15th Revision of Page 0-1
4th Revision of Page 0-1.1
3rd Revision of Page 0-1.19
2nd Revision of Page 0-1.20

This filing is being made by USWC to change its existing Expanded Interconnection/Collocation (EIC) service to introduce standardized rate elements for vendor specific equipment rather than having the rates on an Individual Case Basis (ICB) as previously tariffed. This filing, which will be an "interim" filing, is being made pursuant to the FCC's Joint Motion For Partial Stay Of Mandate, filed with the United States Court Of Appeals For The District Of Columbia Circuit on August 9, 1994 in Bell Atlantic Telephone Companies, et al v. Federal Communications Commission & USA, No. 92-1619 (and consolidated cases) and in accordance with the Commission's Memorandum Opinion and Order (Order) in CC Docket No. 91-141 released July 25, 1994 and the Commission's Tariff Review Plan Order (TRP Order), DA 94-819, released July 25, 1994.

In order to establish standard rates for the vendor specific interconnector-designated equipment, USWC has contacted the various vendors of the equipment to obtain non proprietary prices. While USWC made every effort to secure this information prior to the tariff filing, it has not received all the non-proprietary cost information from the vendors prior to the required file date.

SEP 06 1994

**Secretary
Transmittal No. 530
September 1, 1994
Page Two**

Once the non-proprietary cost information has been received from the vendor, USWC will file tariff revisions to include the necessary tariff information to fully comply with the FCC's Order. USWC expects that this information will be available from the vendor, although no vendor has committed to a specific time frame, to allow USWC to file the tariff revisions during the week of September 12, 1994.

Attached is a copy of a Petition For A Temporary Waiver Or In The Alternative For An Extension Of Time Of Effective Date filed by USWC seeking a short term waiver of that portion of the Commission's Order as it is to be implemented under the terms of the Settlement and a letter from Mark Evans, Esq. to William E. Kennard, Esq., August 9, 1994. In the waiver, USWC requests that the Commission temporarily waive its September 4th effective date with respect to the need to provide cost and price information with respect to interconnector-designated terminating equipment; or in the alternative that the Commission grant USWC a limited extension of time in which to publish such rates, i.e., until such time as USWC has been provided the necessary information from which to determine the rate.

Under authority of Special Permission No. 94-1006, this "interim" filing is being made by USWC with an effective date of less than statutory notice. This filing is scheduled to become effective on September 3, 1994 and will remain in effect through December 14, 1994.

Supporting information discussed under Section 61.38 of the Commission's Rules is, to the extent applicable, included with this filing in the attached Description and Justification.

In accordance with Section 61.32(b), the original Transmittal Letter, the Federal Communications Commission Form 159 and the filing fee have been submitted to a courier service for delivery to the Treasury Department lockbox located at the Mellon Bank in Pittsburgh, Pennsylvania.

In accordance with Sections 61.32(a) and (c), the appropriate tariff pages and attachments are hereby delivered to the Secretary, Federal Communications Commission, their commercial contractor and the Chief, Tariff Review Branch. These actions have been committed on the date established as the issued/filed date as reflected above.

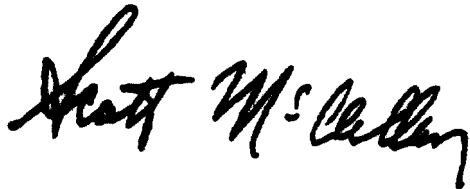
Secretary
Transmittal No. 530
September 1, 1994
Page Three

Acknowledgment and date of receipt of this filing are requested. A duplicate letter of transmittal is attached for this purpose.

All correspondence and inquiries in connection with this filing, including service copies of petitions, should be directed to:

Ms. Cyndie Eby
U S WEST, Inc.
1020-19th Street N.W. Suite 700
Washington, D.C. 20036
Phone (202) 429-3106
Facsimile (202) 296-5157

Respectfully,

A handwritten signature in black ink, appearing to read "Scott McCallum". The signature is written in a cursive, flowing style.

Attachments:
Duplicate Letter
Tariff Page(s)
Description and Justification
Copy of Waiver

ATTACHMENT F

U S WEST

SERVICE BY SERVICE OVERHEAD FACTORS

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SERVICE	PRICE/COST RATIO	CIRCUIT	DIRECT COST	ENTERANCE FACILITY			PRICE/COST RATIO	MILEAGE	DIRECT COST
		PRICE		PRICE/COST RATIO .	PRICE	DIRECT COST		PRICE	
DS1	3.3939	\$525.92	\$154.98	1.6217	\$116.82	\$76.77	5.2320	\$409.10	\$78.1
DS3	2.3644	\$1,350.00	\$570.98	2.3644	\$1,350.00	\$570.98	0.0000	\$0.00	\$0.0

SERVICE	CIRCUIT			CHANNEL TERMINATION			MILEAGE		
	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST
DS1 Service									
Monthly	2.8518	\$310.50	\$108.88	1.6478	\$126.50	\$76.77	5.7303	\$184.00	\$32.11
36 Months	2.8581	\$370.35	\$129.58	1.5240	\$117.00	\$76.77	4.7974	\$253.35	\$52.81
60 Months	2.8268	\$402.25	\$142.30	1.4003	\$107.50	\$76.77	4.5000	\$294.75	\$65.50
DS1 W/ SHARP									
Monthly	2.6722	\$343.14	\$128.41	1.6525	\$159.14	\$96.30	5.7303	\$184.00	\$32.11
36 Months	2.7026	\$402.99	\$149.11	1.5539	\$148.64	\$96.30	4.7974	\$253.35	\$52.81
60 Months	2.6715	\$432.25	\$161.80	1.4278	\$137.50	\$96.30	4.5000	\$294.75	\$65.50
DS3 Monthly - EL									
Cap 1	1.9074	\$1,918.00	\$1,005.56	2.3644	\$1,350.00	\$570.98	1.3069	\$568.00	\$434.60
Cap 2	1.7456	\$3,392.00	\$1,943.16	2.1006	\$2,258.00	\$1,073.96	1.3069	\$1,136.00	\$869.20
Cap 3	1.7274	\$4,312.00	\$2,496.29	2.1870	\$2,608.00	\$1,192.49	1.3069	\$1,704.00	\$1,303.80
Cap 6	1.7138	\$7,348.00	\$4,287.59	2.3453	\$3,940.00	\$1,679.99	1.3069	\$3,408.00	\$2,607.60
Cap 9	1.7272	\$10,831.00	\$6,270.86	2.4239	\$5,719.00	\$2,359.46	1.3069	\$5,112.00	\$3,911.40
Cap 12	1.7328	\$14,375.00	\$8,296.00	2.4536	\$7,559.00	\$3,080.80	1.3069	\$6,816.00	\$5,215.20
Cap 24	1.7296	\$28,112.00	\$16,253.51	2.4866	\$14,480.00	\$5,823.11	1.3069	\$13,632.00	\$10,430.40
Cap 36	1.6622	\$40,348.00	\$24,274.53	2.3062	\$19,900.00	\$8,628.93	1.3069	\$20,448.00	\$15,645.60
DS3 Monthly - OP									
Cap 2	1.6400	\$3,013.00	\$1,837.18	1.9391	\$1,877.00	\$967.98	1.3069	\$1,136.00	\$869.20
Cap 3	1.6178	\$3,661.00	\$2,262.98	2.0403	\$1,957.00	\$959.18	1.3069	\$1,704.00	\$1,303.80
Cap 6	1.6184	\$6,191.00	\$3,825.31	2.2854	\$2,783.00	\$1,217.71	1.3069	\$3,408.00	\$2,607.60
Cap 9	1.5282	\$8,099.00	\$5,299.62	2.1517	\$2,987.00	\$1,388.22	1.3069	\$5,112.00	\$3,911.40
Cap 12	1.5648	\$10,992.00	\$7,024.54	2.3080	\$4,176.00	\$1,808.34	1.3069	\$6,816.00	\$5,215.20
Cap 18	1.6404	\$16,729.00	\$10,197.94	2.7386	\$6,505.00	\$2,375.14	1.3069	\$10,224.00	\$7,822.80
Cap 24	1.5736	\$21,201.00	\$13,473.30	2.4874	\$7,569.00	\$3,042.90	1.3069	\$13,632.00	\$10,430.40
Cap 36	1.5712	\$31,679.00	\$20,162.43	2.4865	\$11,231.00	\$4,516.83	1.3069	\$20,448.00	\$15,645.60
DS3 W/SHARP Monthly - EL									
Cap 1	2.0006	\$2,168.00	\$1,083.67	2.4651	\$1,600.00	\$649.07	1.3069	\$568.00	\$434.60
Cap 2	1.8539	\$3,892.00	\$2,099.38	2.2403	\$2,756.00	\$1,230.18	1.3069	\$1,136.00	\$869.20
Cap 3	1.8538	\$5,062.00	\$2,730.62	2.3535	\$3,358.00	\$1,426.82	1.3069	\$1,704.00	\$1,303.80
Cap 6	1.8603	\$8,848.00	\$4,756.25	2.5318	\$5,440.00	\$2,148.65	1.3069	\$3,408.00	\$2,607.60
Cap 9	1.8757	\$13,081.00	\$6,973.85	2.6022	\$7,989.00	\$3,062.45	1.3069	\$5,112.00	\$3,911.40
Cap 12	1.8818	\$17,375.00	\$9,233.32	2.6278	\$10,559.00	\$4,018.12	1.3069	\$6,816.00	\$5,215.20
Cap 24	1.8817	\$34,112.00	\$18,128.15	2.6805	\$20,480.00	\$7,697.75	1.3069	\$13,632.00	\$10,430.40
Cap 36	1.8219	\$49,348.00	\$27,086.49	2.5280	\$28,900.00	\$11,440.89	1.3069	\$20,448.00	\$15,645.60

SERVICE	CIRCUIT			CHANNEL TERMINATION			MILEAGE		
	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST
DS3 W/SHARP Monthly - OP									
Cap 2	1.7623	\$3,513.00	\$1,993.40	2.1144	\$2,377.00	\$1,124.20	1.3069	\$1,136.00	\$869.20
Cap 3	1.7663	\$4,411.00	\$2,497.31	2.2681	\$2,707.00	\$1,193.51	1.3069	\$1,704.00	\$1,303.80
Cap 6	1.7911	\$7,691.00	\$4,293.97	2.5398	\$4,283.00	\$1,686.37	1.3069	\$3,408.00	\$2,607.60
Cap 9	1.7241	\$10,349.00	\$6,002.61	2.5043	\$5,237.00	\$2,091.21	1.3069	\$5,112.00	\$3,911.40
Cap 12	1.7574	\$13,992.00	\$7,961.86	2.6126	\$7,176.00	\$2,746.66	1.3069	\$6,816.00	\$5,215.20
Cap 18	1.8295	\$21,229.00	\$11,603.92	2.9105	\$11,005.00	\$3,781.12	1.3069	\$10,224.00	\$7,822.80
Cap 24	1.7723	\$27,201.00	\$15,347.94	2.7593	\$13,569.00	\$4,917.54	1.3069	\$13,632.00	\$10,430.40
Cap 36	1.7706	\$40,679.00	\$22,974.39	2.7605	\$20,231.00	\$7,326.79	1.3069	\$20,448.00	\$15,645.60
DS3 12 Months - EL									
Cap 1	1.8130	\$1,947.00	\$1,073.90	2.2944	\$1,310.00	\$570.95	1.2665	\$637.00	\$502.95
Cap 2	1.6646	\$3,482.00	\$2,079.84	2.0373	\$2,188.00	\$1,073.96	1.2666	\$1,274.00	\$1,005.88
Cap 3	1.6440	\$4,441.00	\$2,701.31	2.1217	\$2,530.00	\$1,192.46	1.2665	\$1,911.00	\$1,508.85
Cap 6	1.6266	\$7,641.00	\$4,697.63	2.2733	\$3,819.00	\$1,679.93	1.2665	\$3,822.00	\$3,017.70
Cap 9	1.6387	\$11,284.00	\$6,885.92	2.3527	\$5,551.00	\$2,359.46	1.2666	\$5,733.00	\$4,526.46
Cap 12	1.6434	\$14,981.00	\$9,116.08	2.3817	\$7,337.00	\$3,080.57	1.2665	\$7,644.00	\$6,035.51
Cap 24	1.6399	\$29,344.00	\$17,893.67	2.4138	\$14,058.00	\$5,823.10	1.2666	\$15,288.00	\$12,070.57
Cap 36	1.5797	\$42,232.00	\$26,734.77	2.2368	\$19,300.00	\$8,626.57	1.2665	\$22,932.00	\$18,106.20
DS3 12 Months - OP									
Cap 2	1.5675	\$3,094.00	\$1,973.86	1.8802	\$1,820.00	\$967.99	1.2666	\$1,274.00	\$1,005.87
Cap 3	1.5438	\$3,810.00	\$2,468.00	1.9799	\$1,899.00	\$959.15	1.2665	\$1,911.00	\$1,508.85
Cap 6	1.5394	\$6,520.00	\$4,235.35	2.2156	\$2,698.00	\$1,217.71	1.2666	\$3,822.00	\$3,017.64
Cap 9	1.4594	\$8,632.00	\$5,914.68	2.0883	\$2,899.00	\$1,388.22	1.2666	\$5,733.00	\$4,526.46
Cap 12	1.4911	\$11,697.00	\$7,844.62	2.2400	\$4,053.00	\$1,809.34	1.2666	\$7,644.00	\$6,035.28
Cap 18	1.5562	\$17,784.00	\$11,428.06	2.6601	\$6,318.00	\$2,375.13	1.2666	\$11,466.00	\$9,052.93
Cap 24	1.4977	\$22,635.00	\$15,113.46	2.4147	\$7,347.00	\$3,042.66	1.2665	\$15,288.00	\$12,070.80
Cap 36	1.4954	\$33,829.00	\$22,622.67	2.4127	\$10,897.00	\$4,516.47	1.2665	\$22,932.00	\$18,106.20
DS3 W/SHARP 12 Months - EL									
Cap 1	1.9002	\$2,189.00	\$1,152.01	2.3912	\$1,552.00	\$649.06	1.2665	\$637.00	\$502.95
Cap 2	1.7647	\$3,946.00	\$2,236.06	2.1720	\$2,672.00	\$1,230.18	1.2666	\$1,274.00	\$1,005.88
Cap 3	1.7601	\$5,167.00	\$2,935.64	2.2820	\$3,258.00	\$1,426.79	1.2665	\$1,911.00	\$1,508.85
Cap 6	1.7601	\$9,093.00	\$5,166.29	2.4532	\$5,271.00	\$2,148.59	1.2665	\$3,822.00	\$3,017.70
Cap 9	1.7739	\$13,462.00	\$7,588.91	2.5236	\$7,729.00	\$3,062.45	1.2666	\$5,733.00	\$4,526.46
Cap 12	1.7790	\$17,885.00	\$10,053.40	2.5489	\$10,241.00	\$4,017.89	1.2665	\$7,644.00	\$6,035.51
Cap 24	1.7782	\$35,152.00	\$19,768.31	2.5805	\$19,864.00	\$7,897.74	1.2666	\$15,288.00	\$12,070.57
Cap 36	1.7242	\$50,944.00	\$29,546.73	2.4485	\$28,012.00	\$11,440.63	1.2665	\$22,932.00	\$18,106.20

SERVICE	CIRCUIT			CHANNEL TERMINATION			MILEAGE		
	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST
DS3 W/SHARP 12 Months - OP									
Cap 2	1.6797	\$3,578.00	\$2,130.08	2.0494	\$2,304.00	\$1,124.21	1.2666	\$1,274.00	\$1,005.87
Cap 3	1.6786	\$4,536.00	\$2,702.33	2.1995	\$2,626.00	\$1,193.48	1.2665	\$1,911.00	\$1,508.85
Cap 6	1.6947	\$7,972.00	\$4,704.01	2.4609	\$4,150.00	\$1,686.37	1.2666	\$3,822.00	\$3,017.64
Cap 9	1.6335	\$10,810.00	\$6,617.67	2.4278	\$5,077.00	\$2,091.21	1.2668	\$5,733.00	\$4,526.48
Cap 12	1.6626	\$14,601.00	\$8,781.94	2.5329	\$6,957.00	\$2,746.66	1.2666	\$7,644.00	\$6,035.28
Cap 18	1.7251	\$22,140.00	\$12,834.04	2.8230	\$10,674.00	\$3,781.11	1.2666	\$11,466.00	\$9,052.93
Cap 24	1.6743	\$28,443.00	\$16,988.10	2.6752	\$13,155.00	\$4,917.30	1.2665	\$15,288.00	\$12,070.80
Cap 36	1.6726	\$42,541.00	\$25,434.63	2.6757	\$19,609.00	\$7,326.43	1.2665	\$22,932.00	\$18,106.20
DS3 24 Months - EL									
Cap 1	1.8118	\$1,760.00	\$971.39	2.2226	\$1,269.00	\$570.95	1.2262	\$491.00	\$400.44
Cap 2	1.8546	\$3,102.00	\$1,874.82	1.9740	\$2,120.00	\$1,073.96	1.2262	\$982.00	\$800.86
Cap 3	1.8392	\$3,924.00	\$2,393.78	2.0554	\$2,451.00	\$1,192.46	1.2262	\$1,473.00	\$1,201.32
Cap 6	1.8289	\$6,650.00	\$4,082.57	2.2049	\$3,704.00	\$1,679.93	1.2262	\$2,946.00	\$2,402.64
Cap 9	1.6424	\$9,794.00	\$5,963.33	2.2781	\$5,375.00	\$2,358.46	1.2262	\$4,419.00	\$3,603.87
Cap 12	1.6480	\$12,996.00	\$7,885.96	2.3061	\$7,104.00	\$3,080.67	1.2261	\$5,892.00	\$4,805.39
Cap 24	1.6453	\$25,392.00	\$15,433.43	2.3369	\$13,608.00	\$5,823.10	1.2262	\$11,784.00	\$9,610.33
Cap 36	1.5785	\$36,376.00	\$23,044.41	2.1672	\$18,700.00	\$8,628.57	1.2262	\$17,676.00	\$14,415.84
DS3 24 Months - OP									
Cap 2	1.5530	\$2,747.00	\$1,768.84	1.8234	\$1,765.00	\$967.99	1.2262	\$982.00	\$800.85
Cap 3	1.5335	\$3,313.00	\$2,160.47	1.9184	\$1,840.00	\$959.15	1.2262	\$1,473.00	\$1,201.32
Cap 6	1.5355	\$5,559.00	\$3,620.29	2.1458	\$2,613.00	\$1,217.71	1.2262	\$2,946.00	\$2,402.58
Cap 9	1.4485	\$7,231.00	\$4,992.09	2.0256	\$2,812.00	\$1,368.22	1.2262	\$4,419.00	\$3,603.87
Cap 12	1.4849	\$9,822.00	\$6,614.50	2.1721	\$3,930.00	\$1,809.34	1.2262	\$5,892.00	\$4,805.16
Cap 18	1.5603	\$14,952.00	\$9,582.88	2.5742	\$6,114.00	\$2,375.13	1.2262	\$8,838.00	\$7,207.75
Cap 24	1.4943	\$18,908.00	\$12,053.48	2.3414	\$7,124.00	\$3,042.66	1.2261	\$11,784.00	\$9,610.82
Cap 36	1.4915	\$28,238.00	\$18,932.31	2.3386	\$10,562.00	\$4,516.47	1.2262	\$17,676.00	\$14,415.84
DS3 W/SHARP 24 Months - EL									
Cap 1	1.9009	\$1,995.00	\$1,049.50	2.3172	\$1,504.00	\$649.06	1.2262	\$491.00	\$400.44
Cap 2	1.7587	\$3,572.00	\$2,031.04	2.1054	\$2,590.00	\$1,230.18	1.2262	\$982.00	\$800.86
Cap 3	1.7613	\$4,629.00	\$2,628.11	2.2120	\$3,156.00	\$1,426.79	1.2262	\$1,473.00	\$1,201.32
Cap 6	1.7709	\$8,060.00	\$4,551.23	2.3802	\$5,114.00	\$2,148.59	1.2262	\$2,946.00	\$2,402.64
Cap 9	1.7864	\$11,909.00	\$6,666.32	2.4458	\$7,490.00	\$3,062.46	1.2262	\$4,419.00	\$3,603.87
Cap 12	1.7925	\$15,816.00	\$8,823.28	2.4700	\$9,924.00	\$4,017.69	1.2261	\$5,892.00	\$4,805.39
Cap 24	1.7929	\$31,032.00	\$17,308.07	2.5005	\$19,248.00	\$7,697.74	1.2262	\$11,784.00	\$9,610.33
Cap 36	1.7340	\$44,836.00	\$25,856.37	2.3740	\$27,160.00	\$11,440.53	1.2262	\$17,676.00	\$14,415.84

SERVICE	CIRCUIT			CHANNEL TERMINATION			MILEAGE		
	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST
DS3 W/SHARP 24 Months - OP									
Cap 2	1.6711	\$3,217.00	\$1,925.06	1.9881	\$2,235.00	\$1,124.21	1.2262	\$982.00	\$800.85
Cap 3	1.6778	\$4,018.00	\$2,394.80	2.1324	\$2,545.00	\$1,193.48	1.2262	\$1,473.00	\$1,201.32
Cap 6	1.7043	\$6,969.00	\$4,088.95	2.3856	\$4,023.00	\$1,688.37	1.2262	\$2,946.00	\$2,402.58
Cap 9	1.6411	\$9,346.00	\$5,695.08	2.3561	\$4,927.00	\$2,091.21	1.2262	\$4,419.00	\$3,603.87
Cap 12	1.8740	\$12,642.00	\$7,551.82	2.4575	\$6,750.00	\$2,746.66	1.2262	\$5,892.00	\$4,805.16
Cap 18	1.7456	\$19,182.00	\$10,988.86	2.7357	\$10,344.00	\$3,781.11	1.2262	\$8,838.00	\$7,207.75
Cap 24	1.6897	\$24,548.00	\$14,527.86	2.5957	\$12,764.00	\$4,917.30	1.2262	\$11,784.00	\$9,610.56
Cap 36	1.6877	\$36,698.00	\$21,744.27	2.5956	\$19,022.00	\$7,328.43	1.2262	\$17,676.00	\$14,415.84
DS3 36 Months - EL									
Cap 1	1.8561	\$1,920.00	\$1,034.40	2.1280	\$1,215.00	\$570.95	1.5212	\$705.00	\$463.45
Cap 2	1.7193	\$3,440.00	\$2,000.84	1.8902	\$2,030.00	\$1,073.96	1.5212	\$1,410.00	\$928.88
Cap 3	1.7280	\$4,463.00	\$2,582.81	1.9690	\$2,348.00	\$1,192.48	1.5212	\$2,115.00	\$1,390.35
Cap 6	1.7437	\$7,778.00	\$4,460.63	2.1120	\$3,548.00	\$1,679.93	1.5212	\$4,230.00	\$2,780.70
Cap 9	1.7599	\$11,493.00	\$6,530.42	2.1819	\$5,148.00	\$2,359.46	1.5212	\$6,345.00	\$4,170.96
Cap 12	1.7662	\$15,264.00	\$8,642.08	2.2087	\$6,804.00	\$3,080.57	1.5212	\$8,460.00	\$5,561.51
Cap 24	1.7676	\$29,954.00	\$16,945.67	2.2383	\$13,034.00	\$5,823.10	1.5212	\$16,920.00	\$11,122.57
Cap 36	1.7134	\$43,279.00	\$25,259.54	2.0744	\$17,899.00	\$8,628.57	1.5209	\$25,380.00	\$16,687.44
DS3 36 Months - OP									
Cap 2	1.6360	\$3,100.00	\$1,894.86	1.7459	\$1,690.00	\$967.99	1.5212	\$1,410.00	\$926.87
Cap 3	1.6497	\$3,876.00	\$2,349.50	1.8360	\$1,761.00	\$959.16	1.5212	\$2,115.00	\$1,390.35
Cap 6	1.6847	\$6,736.00	\$3,998.35	2.0580	\$2,506.00	\$1,217.71	1.5212	\$4,230.00	\$2,780.64
Cap 9	1.6251	\$9,034.00	\$5,559.18	1.9370	\$2,689.00	\$1,388.22	1.5209	\$6,345.00	\$4,171.86
Cap 12	1.6577	\$12,218.00	\$7,370.62	2.0770	\$3,758.00	\$1,809.34	1.5212	\$8,460.00	\$5,561.28
Cap 18	1.7302	\$18,543.00	\$10,717.06	2.4643	\$5,853.00	\$2,375.13	1.5212	\$12,690.00	\$8,341.93
Cap 24	1.6753	\$23,732.00	\$14,165.48	2.2388	\$6,812.00	\$3,042.66	1.5212	\$16,920.00	\$11,122.80
Cap 36	1.6737	\$35,484.00	\$21,200.67	2.2371	\$10,104.00	\$4,516.47	1.5212	\$25,380.00	\$16,684.20
DS3 W/SHARP 36 Months - EL									
Cap 1	1.9281	\$2,145.00	\$1,112.51	2.2186	\$1,440.00	\$649.06	1.5212	\$705.00	\$463.45
Cap 2	1.8034	\$3,890.00	\$2,157.06	2.0160	\$2,480.00	\$1,230.16	1.5209	\$1,410.00	\$927.08
Cap 3	1.8238	\$5,138.00	\$2,817.14	2.1187	\$3,023.00	\$1,426.79	1.5212	\$2,115.00	\$1,390.35
Cap 6	1.8518	\$9,128.00	\$4,929.29	2.2796	\$4,898.00	\$2,148.59	1.5212	\$4,230.00	\$2,780.70
Cap 9	1.8688	\$13,518.00	\$7,233.41	2.3422	\$7,173.00	\$3,082.45	1.5212	\$6,345.00	\$4,170.96
Cap 12	1.8753	\$17,964.00	\$9,579.40	2.3654	\$9,504.00	\$4,017.89	1.5212	\$8,460.00	\$5,561.51
Cap 24	1.8785	\$35,354.00	\$18,820.31	2.3947	\$18,434.00	\$7,697.74	1.5212	\$16,920.00	\$11,122.57
Cap 36	1.8268	\$51,379.00	\$28,124.73	2.2725	\$25,999.00	\$11,440.53	1.5212	\$25,380.00	\$16,684.20

SERVICE	CIRCUIT			CHANNEL TERMINATION			MILEAGE		
	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST
DS3 W/SHARP 36 Months - OP									
Cap 2	1.7308	\$3,550.00	\$2,051.08	1.9036	\$2,140.00	\$1,124.21	1.5212	\$1,410.00	\$926.87
Cap 3	1.7813	\$4,551.00	\$2,583.83	2.0411	\$2,438.00	\$1,193.48	1.5212	\$2,115.00	\$1,390.35
Cap 6	1.8102	\$8,086.00	\$4,487.01	2.2866	\$3,856.00	\$1,686.37	1.5212	\$4,230.00	\$2,780.64
Cap 9	1.7680	\$11,059.00	\$6,262.17	2.2542	\$4,714.00	\$2,091.21	1.5212	\$6,345.00	\$4,170.98
Cap 12	1.7958	\$14,918.00	\$8,307.94	2.3512	\$6,458.00	\$2,746.66	1.5212	\$8,460.00	\$5,561.28
Cap 18	1.8636	\$22,593.00	\$12,123.04	2.6191	\$9,903.00	\$3,781.11	1.5212	\$12,690.00	\$8,341.93
Cap 24	1.8182	\$29,132.00	\$16,040.10	2.4835	\$12,212.00	\$4,917.30	1.5212	\$16,920.00	\$11,122.80
Cap 36	1.8150	\$43,584.00	\$24,012.63	2.4840	\$18,204.00	\$7,328.43	1.5212	\$25,380.00	\$16,684.20
DS3 60 Months - EL									
Cap 1	1.4899	\$1,600.00	\$1,073.90	1.8916	\$1,080.00	\$570.95	1.0339	\$520.00	\$502.95
Cap 2	1.3679	\$2,845.00	\$2,079.84	1.6807	\$1,805.00	\$1,073.96	1.0339	\$1,040.00	\$1,005.88
Cap 3	1.3493	\$3,645.00	\$2,701.31	1.7485	\$2,085.00	\$1,192.46	1.0339	\$1,560.00	\$1,508.85
Cap 6	1.3349	\$6,271.00	\$4,697.83	1.8757	\$3,151.00	\$1,679.83	1.0339	\$3,120.00	\$3,017.70
Cap 9	1.3443	\$9,257.00	\$6,885.92	1.9399	\$4,577.00	\$2,359.46	1.0339	\$4,680.00	\$4,526.46
Cap 12	1.3482	\$12,290.00	\$9,116.08	1.9639	\$6,050.00	\$3,080.57	1.0339	\$6,240.00	\$6,035.51
Cap 24	1.3451	\$24,069.00	\$17,893.67	1.9902	\$11,589.00	\$5,823.10	1.0339	\$12,480.00	\$12,070.57
Cap 36	1.2962	\$34,654.00	\$26,734.77	1.8467	\$15,934.00	\$8,628.57	1.0339	\$18,720.00	\$18,106.20
DS3 60 Months - OP									
Cap 2	1.2878	\$2,542.00	\$1,973.86	1.5517	\$1,502.00	\$967.99	1.0339	\$1,040.00	\$1,005.87
Cap 3	1.2666	\$3,126.00	\$2,468.00	1.6327	\$1,568.00	\$959.15	1.0339	\$1,560.00	\$1,508.85
Cap 6	1.2629	\$5,349.00	\$4,235.35	1.8305	\$2,229.00	\$1,217.71	1.0339	\$3,120.00	\$3,017.64
Cap 9	1.1955	\$7,071.00	\$5,914.68	1.7223	\$2,391.00	\$1,388.22	1.0339	\$4,680.00	\$4,526.46
Cap 12	1.2213	\$9,581.00	\$7,844.62	1.8465	\$3,341.00	\$1,809.34	1.0339	\$6,240.00	\$6,035.28
Cap 18	1.2741	\$14,560.00	\$11,428.06	2.1894	\$5,200.00	\$2,375.13	1.0339	\$9,360.00	\$9,052.93
Cap 24	1.2264	\$18,535.00	\$15,113.46	1.9900	\$6,055.00	\$3,042.66	1.0339	\$12,480.00	\$12,070.80
Cap 36	1.2243	\$27,698.00	\$22,622.67	1.9878	\$8,978.00	\$4,516.47	1.0339	\$18,720.00	\$18,106.20
DS3 W/SHARP 60 Months - EL									
Cap 1	1.5625	\$1,800.00	\$1,152.01	1.9721	\$1,280.00	\$649.06	1.0339	\$520.00	\$502.95
Cap 2	1.4512	\$3,245.00	\$2,236.06	1.7924	\$2,205.00	\$1,230.18	1.0339	\$1,040.00	\$1,005.88
Cap 3	1.4460	\$4,245.00	\$2,935.64	1.8818	\$2,685.00	\$1,426.79	1.0339	\$1,560.00	\$1,508.85
Cap 6	1.4461	\$7,471.00	\$5,186.29	2.0250	\$4,351.00	\$2,148.59	1.0339	\$3,120.00	\$3,017.70
Cap 9	1.4570	\$11,057.00	\$7,588.91	2.0823	\$6,377.00	\$3,062.45	1.0339	\$4,680.00	\$4,526.46
Cap 12	1.4612	\$14,890.00	\$10,053.40	2.1031	\$8,450.00	\$4,017.89	1.0339	\$6,240.00	\$6,035.51
Cap 24	1.4604	\$28,869.00	\$19,768.31	2.1291	\$16,389.00	\$7,897.74	1.0339	\$12,480.00	\$12,070.57
Cap 36	1.4165	\$41,854.00	\$29,548.73	2.0221	\$23,134.00	\$11,440.53	1.0339	\$18,720.00	\$18,106.20

SERVICE	CIRCUIT			CHANNEL TERMINATION			MILEAGE		
	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST
DS3 W/SHARP 60 Months - OP									
Cap 2	1.3812	\$2,942.00	\$2,130.08	1.6919	\$1,902.00	\$1,124.21	1.0339	\$1,040.00	\$1,005.87
Cap 3	1.3788	\$3,728.00	\$2,702.33	1.8149	\$2,188.00	\$1,193.48	1.0339	\$1,580.00	\$1,508.85
Cap 6	1.3922	\$6,549.00	\$4,704.01	2.0334	\$3,429.00	\$1,686.37	1.0339	\$3,120.00	\$3,017.64
Cap 9	1.3405	\$8,871.00	\$6,617.67	2.0041	\$4,191.00	\$2,091.21	1.0339	\$4,680.00	\$4,528.48
Cap 12	1.3643	\$11,981.00	\$8,781.94	2.0902	\$5,741.00	\$2,746.66	1.0339	\$6,240.00	\$6,035.28
Cap 18	1.4150	\$18,180.00	\$12,834.04	2.3274	\$8,800.00	\$3,781.11	1.0339	\$9,360.00	\$9,052.93
Cap 24	1.3736	\$23,335.00	\$16,988.10	2.2075	\$10,855.00	\$4,917.30	1.0339	\$12,480.00	\$12,070.80
Cap 36	1.3721	\$34,898.00	\$25,434.63	2.2078	\$16,178.00	\$7,328.43	1.0339	\$18,720.00	\$18,108.20
DS3 120 Months - EL									
Cap 1	1.6435	\$1,700.00	\$1,034.40	1.8916	\$1,080.00	\$570.95	1.3378	\$620.00	\$463.45
Cap 2	1.5211	\$3,045.00	\$2,001.84	1.8807	\$1,808.00	\$1,073.96	1.3364	\$1,240.00	\$927.88
Cap 3	1.5274	\$3,945.00	\$2,582.81	1.7485	\$2,085.00	\$1,192.48	1.3378	\$1,860.00	\$1,390.35
Cap 6	1.5404	\$6,871.00	\$4,460.63	1.8757	\$3,151.00	\$1,679.93	1.3378	\$3,720.00	\$2,780.70
Cap 9	1.5553	\$10,157.00	\$6,530.42	1.9399	\$4,577.00	\$2,359.46	1.3378	\$5,580.00	\$4,170.96
Cap 12	1.5610	\$13,490.00	\$8,642.08	1.9639	\$6,050.00	\$3,080.57	1.3378	\$7,440.00	\$5,561.51
Cap 24	1.5620	\$26,469.00	\$16,945.67	1.9902	\$11,589.00	\$5,823.10	1.3378	\$14,880.00	\$11,122.57
Cap 36	1.5113	\$38,254.00	\$25,312.77	1.8467	\$15,934.00	\$8,628.57	1.3378	\$22,320.00	\$16,684.20
DS3 120 Months - OP									
Cap 2	1.4471	\$2,742.00	\$1,894.86	1.5517	\$1,502.00	\$967.99	1.3378	\$1,240.00	\$926.87
Cap 3	1.4582	\$3,426.00	\$2,349.50	1.6327	\$1,588.00	\$959.15	1.3378	\$1,860.00	\$1,390.35
Cap 6	1.4879	\$5,949.00	\$3,998.35	1.8305	\$2,229.00	\$1,217.71	1.3378	\$3,720.00	\$2,780.64
Cap 9	1.4338	\$7,971.00	\$5,559.18	1.7223	\$2,391.00	\$1,388.22	1.3378	\$5,580.00	\$4,170.96
Cap 12	1.4627	\$10,781.00	\$7,370.62	1.8465	\$3,341.00	\$1,809.34	1.3378	\$7,440.00	\$5,561.28
Cap 18	1.5265	\$16,380.00	\$10,717.06	2.1894	\$5,200.00	\$2,375.13	1.3378	\$11,160.00	\$8,341.93
Cap 24	1.4779	\$20,935.00	\$14,165.46	1.9900	\$6,055.00	\$3,042.66	1.3378	\$14,880.00	\$11,122.80
Cap 36	1.4763	\$31,298.00	\$21,200.67	1.9878	\$8,978.00	\$4,516.47	1.3378	\$22,320.00	\$16,684.20
DS3 W/SHARP 120 Months - EL									
Cap 1	1.7078	\$1,900.00	\$1,112.51	1.9721	\$1,280.00	\$649.06	1.3378	\$620.00	\$463.45
Cap 2	1.5971	\$3,445.00	\$2,157.06	1.7924	\$2,205.00	\$1,230.18	1.3378	\$1,240.00	\$926.88
Cap 3	1.6133	\$4,545.00	\$2,817.14	1.8818	\$2,685.00	\$1,426.79	1.3378	\$1,860.00	\$1,390.35
Cap 6	1.6374	\$8,071.00	\$4,929.29	2.0250	\$4,351.00	\$2,148.59	1.3378	\$3,720.00	\$2,780.70
Cap 9	1.6530	\$11,957.00	\$7,233.41	2.0823	\$6,377.00	\$3,062.48	1.3378	\$5,580.00	\$4,170.96
Cap 12	1.6588	\$15,890.00	\$9,579.40	2.1031	\$8,450.00	\$4,017.89	1.3378	\$7,440.00	\$5,562.48
Cap 24	1.6614	\$31,269.00	\$18,820.31	2.1291	\$16,389.00	\$7,697.74	1.3378	\$14,880.00	\$11,122.87
Cap 36	1.6162	\$45,454.00	\$28,124.73	2.0221	\$23,134.00	\$11,440.53	1.3378	\$22,320.00	\$16,684.20

SERVICE	CIRCUIT			CHANNEL TERMINATION			MILEAGE		
	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST	PRICE/COST RATIO	PRICE	DIRECT COST
DS3 W/SHARP 120 Months - OP									
Cap 2	1.5319	\$3,142.00	\$2,051.08	1.6919	\$1,902.00	\$1,124.21	1.3378	\$1,240.00	\$926.87
Cap 3	1.5582	\$4,026.00	\$2,583.83	1.8149	\$2,166.00	\$1,193.48	1.3378	\$1,860.00	\$1,390.35
Cap 6	1.6004	\$7,149.00	\$4,467.01	2.0334	\$3,429.00	\$1,686.37	1.3378	\$3,720.00	\$2,780.64
Cap 9	1.5603	\$9,771.00	\$6,262.17	2.0041	\$4,191.00	\$2,091.21	1.3378	\$5,580.00	\$4,170.96
Cap 12	1.5866	\$13,181.00	\$8,307.94	2.0902	\$5,741.00	\$2,746.66	1.3378	\$7,440.00	\$5,561.28
Cap 18	1.6465	\$19,960.00	\$12,123.04	2.3274	\$8,800.00	\$3,781.11	1.3378	\$11,160.00	\$8,341.93
Cap 24	1.6044	\$25,735.00	\$16,040.10	2.2075	\$10,855.00	\$4,917.30	1.3378	\$14,880.00	\$11,122.80
Cap 36	1.6032	\$38,498.00	\$24,012.63	2.2076	\$16,178.00	\$7,328.43	1.3378	\$22,320.00	\$16,684.20

U S WEST Communications, Inc.

Response To FCC EIC TRP Order

1-Sep-94

Service: DSI

Term: AM

Monthly Average Miles: PLTS=7, DTT=21

36 months Average Miles: 11

60 Months Average Miles: 16

A. TOTAL UNIT INVESTMENT

B. CAPITAL COSTS

DEPRECIATION

EARNINGS

INCOME TAX

TOTAL CAPITAL COSTS

C. OPERATING EXPENSES

MAINTENANCE

AD VALOREM

ADMINISTRATION

BUSINESS FEES

OTHER

TOTAL OPERATING EXPENSE

D. TOTAL ANNUAL DIRECT (B+C)

E. TOTAL MONTHLY DIRECT (D/12)

F. TOTAL DIRECT UNIT COST/

TOTAL UNIT INVESTMENTS

CIAN TERM & ENT FAC	CIAN TERM W/SHARP	7 MILES	11 MILES	16 MILES	21 MILES
\$3,966.40	\$4,970.06	\$1,694.66	\$2,044.15	\$3,551.44	\$4,258.73
\$400.90	\$506.67	\$155.98	\$244.98	\$297.10	\$349.22
\$106.00	\$244.07	\$82.62	\$140.89	\$177.75	\$214.60
\$93.04	\$114.21	\$41.95	\$70.73	\$89.00	\$107.27
\$600.74	\$864.95	\$280.55	\$456.60	\$563.85	\$671.09
\$67.43	\$84.13	\$31.14	\$54.70	\$69.62	\$84.53
\$44.82	\$53.44	\$19.15	\$32.15	\$40.15	\$48.15
\$121.67	\$139.54	\$32.19	\$53.67	\$67.02	\$80.37
\$6.54	\$13.30	\$2.69	\$4.42	\$5.48	\$6.54
\$0.00	\$0.00	\$19.56	\$32.18	\$39.92	\$47.65
\$240.46	\$290.61	\$104.73	\$177.12	\$222.18	\$267.25
\$921.20	\$1,155.56	\$385.28	\$633.72	\$786.03	\$938.34
\$76.77	\$96.30	\$32.11	\$52.81	\$65.50	\$78.19
0.232250908	0.232304235	0.227346986	0.222814365	0.221326532	0.220332897

U S WEST Communications, Inc.

Response To FCC EIC TRP Order
1-Sep-94Service: DS3 Channel Termination
Term: AN

	ELECTRICAL							
	CAP1	CAP 2	CAP 3	CAP 6	CAP 9	CAP 12	CAP 24	CAP 36
A. TOTAL UNIT INVESTMENT	\$30,855.97	\$57,912.76	\$63,809.80	\$88,453.66	\$123,942.67	\$161,013.50	\$302,536.79	\$114,429.22
B. CAPITAL COSTS								
DEPRECIATION	\$2,636.28	\$4,977.48	\$5,600.04	\$8,103.12	\$11,423.88	\$15,039.00	\$28,688.88	\$11,062.84
EARNINGS	\$1,748.64	\$3,274.80	\$3,579.96	\$4,879.32	\$6,819.72	\$9,811.48	\$16,449.00	\$23,942.28
INCOME TAX	\$777.72	\$1,456.08	\$1,591.20	\$2,167.08	\$3,029.40	\$3,913.08	\$7,301.40	\$10,624.92
TOTAL CAPITAL COSTS	\$5,162.64	\$9,708.36	\$10,771.20	\$15,149.52	\$21,273.00	\$27,763.56	\$52,439.28	\$77,630.04
C. OPERATING EXPENSES								
MAINTENANCE	\$460.68	\$870.84	\$985.20	\$1,440.72	\$2,033.28	\$2,684.64	\$5,139.60	\$7,751.52
AD VALOREM	\$357.96	\$671.76	\$740.16	\$1,036.12	\$1,437.60	\$1,868.28	\$3,510.60	\$5,157.00
ADMINISTRATION	\$820.44	\$1,542.72	\$1,709.28	\$2,396.88	\$3,363.72	\$4,384.20	\$8,279.40	\$12,253.44
BUSINESS FEES	\$49.80	\$93.84	\$104.04	\$146.64	\$205.92	\$268.92	\$508.44	\$752.16
OTHER	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL OPERATING EXPENSE	\$1,688.88	\$3,179.16	\$3,538.68	\$5,010.36	\$7,040.52	\$9,206.04	\$17,438.04	\$25,917.12
D. TOTAL ANNUAL DIRECT (B+C)	\$6,851.52	\$12,887.52	\$14,309.88	\$20,159.88	\$28,313.52	\$36,969.60	\$69,877.32	\$103,547.16
E. TOTAL MONTHLY DIRECT (D/12)	\$570.96	\$1,073.96	\$1,192.49	\$1,679.99	\$2,359.46	\$3,080.80	\$5,823.11	\$8,628.93
F. TOTAL DIRECT UNIT COST/ TOTAL UNIT INVESTMENTS	0.22204844	0.222533342	0.224258343	0.227914594	0.228440456	0.229605592	0.230971314	0.232989091

U S WEST Communications, Inc.

Response To FCC EIC TRP Order

1-Sep-94

Service: DSD Channel Termination

Term: AN

OPTICAL

	CAP 2	CAP 3	CAP 6	CAP 9	CAP 12	CAP 18	CAP 24	CAP 36
A. TOTAL UNIT INVESTMENT	\$54,399.55	\$53,891.62	\$67,395.42	\$76,246.75	\$98,244.23	\$127,528.17	\$162,489.51	\$218,199.4
B. CAPITAL COSTS								
DEPRECIATION	\$4,280.04	\$4,233.84	\$5,559.36	\$6,432.60	\$8,590.68	\$11,487.84	\$14,910.48	\$22,443.60
EARNINGS	\$3,175.00	\$3,146.76	\$3,871.44	\$4,345.68	\$5,925.52	\$7,090.80	\$8,970.00	\$13,000.80
INCOME TAX	\$1,413.48	\$1,400.76	\$1,722.12	\$1,932.72	\$2,456.40	\$3,151.32	\$3,984.72	\$5,773.44
TOTAL CAPITAL COSTS	\$8,868.60	\$8,781.36	\$11,152.92	\$12,711.00	\$16,972.60	\$21,729.96	\$27,865.20	\$41,217.84
C. OPERATING EXPENSES								
MAINTENANCE	\$701.16	\$697.80	\$919.20	\$1,069.92	\$1,432.08	\$1,940.16	\$2,505.36	\$3,876.84
AD VALOREM	\$631.08	\$625.20	\$782.16	\$883.92	\$1,140.36	\$1,479.96	\$1,883.64	\$2,763.48
ADMINISTRATION	\$1,310.20	\$1,321.80	\$1,651.68	\$1,872.36	\$2,408.64	\$3,141.64	\$3,994.08	\$5,946.24
BUSINESS FEES	\$84.72	\$84.00	\$106.56	\$121.44	\$158.40	\$207.96	\$266.52	\$397.56
OTHER	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
TOTAL OPERATING EXPENSE	\$2,747.16	\$2,728.80	\$3,459.60	\$3,947.64	\$5,139.48	\$6,771.72	\$8,649.60	\$12,984.12
D. TOTAL ANNUAL DIRECT (B+C)	\$11,615.76	\$11,510.16	\$14,612.52	\$16,658.64	\$21,712.08	\$28,501.68	\$36,514.80	\$54,201.96
E. TOTAL MONTHLY DIRECT (D/12)	\$967.98	\$959.18	\$1,217.71	\$1,388.22	\$1,809.34	\$2,375.14	\$3,042.90	\$4,516.83
F. TOTAL DIRECT UNIT COST/ TOTAL UNIT INVESTMENTS	0.213526766	0.213579774	0.216817701	0.21848328	0.22100107	0.223493209	0.224720968	0.227548627